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October 6, 2021

VIA CM/ECF

Honorable Mary Kay Vyskocil United States District Judge United States District Court Southern District of New York 500 Pearl Street, Room 2230 New York, NY 10007

Re: Goureau, et al. v. Lemonis, et al.; Case No. 1:20-cv-04691-MKV

Response to Plaintiffs' October 5, 2021 letter-motion

Honorable Judge Vyskocil:

ML Defendants will not belabor the other points raised in Plaintiffs' latest letter (Dkt. No. 87) because ML Defendants agree with Plaintiffs' proposed schedule of filing their new motion for leave to amend on October 18, 2021, with Defendants' oppositions due November 1, 2021 and Plaintiffs' replies due November 8, 2021. Indeed, ML Defendants would have so informed Plaintiffs had they contacted ML Defendants about this proposed schedule prior to making their application to the Court.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Jesse M. Coleman

Jesse M. Coleman

JMC

cc: Counsel of record (via ECF)